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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
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In re

Citicare, Inc.,	**Chapter 11**
Debtor.	**Case No. 13-11902-alg**

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MOTION FOR AN ORDER EXTENDING THE DEBTOR'S TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES, RULE 1007-2 DECLARATION, STATEMENTS OF FINANCIAL AFFAIRS AND LISTS OF EXECUTORY CONTRACTS, UNEXPIRED LEASES AND EQUITY SECURITY HOLDERS.

TO: THE HONORABLE ALLAN L. GROPPER,
UNITED STATES BANKRUPTCY JUDGE

Citicare, Inc., the above-captioned debtor and debtor-in-possession (the "Debtor"), respectfully represents:

BACKGROUND.

1. The Debtor filed its voluntary petition for relief under chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§101 *et seq.* (the "Bankruptcy Code") on June 9, 2013 (the "Petition Date").

2. The Debtor continues to manage its property as a debtor and debtor-in-possession. No trustee or examiner has been appointed in

this case. Also, no official committee of unsecured creditors has been appointed.

3. The Debtor is a New York Corporation and is a New York State Licensed Diagnostic and Treatment Center providing comprehensive primary and specialty care to medically underserved communities. The Debtor operates from its premises (the "Premises") located at 154 West 127th Street in the borough of Manhattan, City of New York.

4. The Debtor's emergent need to seek relief was necessitated by the Internal Revenue Service (the "IRS") levying the Debtor's accounts for tax liability, which the IRS alleges to be in the amount of approximately $1,100,000.00. Additionally, the New York Department of Health ("NYDPH") alleges that it is owed approximately $300,000.00 and, as a result, is withholding payment from the Debtor for services until the matter is resolved. The withholding of payment by the NYDPH has had an adverse effect on the Debtor's business.

5. The failure of the Debtor's business would adversely affect the residents medically underserved community which rely upon the Debtor as their primary source of medical care.

6. The Debtor's management believes that, given the breathing spell provided by the filing of this case, the Debtor will be able to successfully reorganize through restructuring its finances, finding an investor and/or resolving consensually any issues with

the IRS or NYDPH.

RELIEF REQUESTED.

7. For the reasons set forth below, the Debtor seeks in the instant motion (the "Motion"), entry of an order, extending its time to file respective schedules of assets and liabilities (the "Schedules"), statements of financial affairs ("Statements") and lists of executory contracts, unexpired leases, and equity security holders ("Lists") through and including July 24, 2013.

BASIS FOR RELIEF REQUESTED.

8. Pursuant to Rule 1007(c) of the Federal Rules of Bankruptcy Procedure, the initial time within which the Debtor must file its Schedules, Statements and Lists expires to June 24, 2013. The Debtor now respectfully requests an extension to July 24, 2013 to file the documents.

9. The Debtor's president, had very scant time to assemble and prepare the information necessary to complete the Schedules, Statements and Lists before the filing of the Debtor's Chapter 11 case, as — - he has been actively seeking to reorganize the Debtor's affairs. Additionally, the Debtor filed the Petition on an emergent basis as the IRS levied the Debtor's accounts.

10. Given the requested additional time, the Debtor's management and counsel will work to prepare the Schedules, Statements, Rule 1007-2 Declaration, and Lists to reflect accurately the financial circumstances of the Debtor as of the

Petition Date. To reiterate, however, due to the aforementioned constraints of time and resources, the Debtor will require additional time to prepare the Schedules, Statements and Lists.

11. Accordingly, this Motion is being submitted to obtain an extension, through and including July 24, 2013 of the time in which the Debtor may file its Schedules, Statements, Rule 1007-2 Declaration and Lists, without prejudice to the Debtor's right to seek further extensions for cause.

CONCLUSION.

12. Although no committee of unsecured creditors has been appointed or designated herein, this Motion has been submitted to the Office of the United States Trustee. The Debtor respectfully submits and requests that this Court so find that no further notice is required.

13. No previous motion for the relief requested herein has been made to this or any other Court.

14. The Debtor respectfully submits that no new or novel issue of law with respect to the matters contained herein is presented, and that no controversial issue of fact is raised and respectfully requests that the requirement of a memorandum of law, pursuant to the Local Bankruptcy Rules, be waived.

WHEREFORE, the Debtor respectfully requests entry of an order granting the extension of time to file its Schedules, Statements and Lists through and including July 24, 2013.

Dated: June 17, 2013
New York, New York

Citicare, Inc.,
Debtor and Debtor in Possession

/s/
Silva Umukoro
President

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